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Leonard Tucker, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LEONARD TUCKER, LLC, a Florida Limited
Liability Company,

Plaintiff/Counter-Defendant,

vs.

CLEAN VISION CORPORATION, f/k/a
BYZEN Digital, Inc., a Nevada Domestic
Corporation,

Defendant/Counter-Claimant

And All Related Claims.

Case No: 2:23-cv-00296-MGN-VCF

**STIPULATION AND ORDER TO
EXTEND STAY PENDING
ARBITRATION**

Plaintiff/Counter-Defendants Leonard Tucker, LLC (“Tucker”) and Defendant/Counter-
Plaintiff Clean Vision Corporation, f/k/a Byzen Digital, Inc. (“Clean Vision,” together with
Tucker the “Parties”), through their respective counsel of record, hereby stipulate and agree as
follows:

1. On January 30, 2023, Tucker filed a Complaint in the Second Judicial District Court of the State of Nevada, generally alleging that Clean Vision breached a certain Consulting Agreement dated December 14, 2020 (the “Agreement”). (ECF No. 1, Ex. A).
2. On February 24, 2023, Clean Vision filed a Notice of Removal in this Court, (ECF No. 1), and filed an Amended Notice of Removal on February 27, 2023. (ECF No. 6). Clean

1 Vision's removal documents allege, among other things, that "[r]emoval is proper
2 [b]ecasue this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1332 and
3 1441(b).

- 4 3. On February 27, 2023, Clean Vision also filed its Answer, Jury Demand, Affirmative
5 Defenses, and Counterclaims against Leonard Tucker LLC and Leonard Tucker,
6 individually. (ECF No. 7). Clean Vision's Answer generally alleges, among other things,
7 that the Agreement is invalid and, alternatively, if the Agreement is valid, Tucker
8 breached the Agreement. (*Id.*)
- 9 4. On March 10, 2023, the Parties submitted a Stipulation and Order to Stay Case Pending
10 Arbitration, wherein the Parties requested "an Order from this Court staying this action
11 pending the outcome of the alternate dispute resolution proceedings . . . pursuant to the
12 Agreement" underlying the Parties' dispute. (ECF No. 12 ¶ 10). The Stipulation and
13 Order was granted, and this Court ordered that this Action would be stayed for a period
14 of 180 days. (*See* ECF No. 14).
- 15 5. This Court also entered a Minute Order on March 10, 2023, ordering that the parties shall
16 submit a Joint Status Report every ninety (90) days, beginning on June 8, 2023.
- 17 6. The Parties submitted a Joint Status Report on June 6, 2023, wherein the Parties informed
18 the Court that arbitration proceedings are scheduled to begin on October 30, 2023, in Las
19 Vegas, Nevada. (ECF No. 20 at 2).
- 20 7. The Parties thus request an Order from this Court extending the stay in this action for an
21 additional 180-days pending the outcome of the arbitration.

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8. The instant request is made in good faith and not for purposes of delay.

DATED this 6th day of September 2023.

MARQUIS AURBACH

DICKINSON WRIGHT PLLC

/s/ Alexander K. Calaway

/s/ Brooks T. Westergard

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ORDER

Based on the foregoing Stipulation, and good cause appearing, IT IS HEREBY ORDERED that the foregoing Stipulation is GRANTED. This action will be stayed for an additional one-hundred eighty (180) days pending the outcome of the arbitration proceedings referred to in the Parties' Stipulation.

IT IS SO ORDERED.

DATED: Sept. 6, 2023



Hon. Gloria M. Navarro United States District Court
Judge

CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND STAY PENDING ARBITRATION** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 6th day of September, 2023. I further certify all parties of interest have been served electronically through the Court's CM/ECF system as follows:

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